

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

ERIN BULL, et al.,

Plaintiffs,

v.

CLARENCE H. CARTER, in his official capacity  
as Commissioner of the Tennessee Department of  
Human Services,

Defendant.

Civil Action No. 3:25-cv-00041

Class Action

Chief Judge Campbell

Magistrate Frensley

**AGREED ORDER**

The parties have jointly moved under Fed. R. Civ. P. 26(c) for a stay of discovery to last until submission of the Special Master's report provided that Defendant produces select documentation as outlined below.

Good cause exists for a stay of discovery to provide the Special Master with the best chance of success and to reduce burden on the agency. Defendant has represented that many of the same individuals at the Department of Human Services who would be responsible for responding to inquiries from a special master are the same individuals who would likely be responding to discovery requests if issued by Plaintiffs.

The parties' Joint Motion is GRANTED.

- (1) Discovery shall be stayed in this matter until the issuance of the Special Master's report, which is required to be submitted 90 days after his or her appointment;
- (2) Defendant shall produce the following documents to Plaintiffs that that DHS generates during the stay and provides to the Food and Nutrition Service ("FNS") of the United States Department of Agriculture: any FNS 366B reports including FY25 Q2 366B,

Quality Control Application Processing Timeliness reviews or reports, state-reported APT rates, and Corrective Action Plan responses. Defendant will produce these documents to Plaintiffs within 5 business days of production to FNS.

**IT IS SO ORDERED.**

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WILLIAM L. CAMPBELL, JR.  
CHIEF UNITED STATES DISTRICT JUDGE

April 25, 2025

Respectfully submitted,

/s Brant Harrell

Brant Harrell

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via the Court's electronic records system (CM/ECF) on this the 25th day of April, 2025 to the counsel listed below:

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